

From: [REDACTED]
To: [Manston Airport](#)
Subject: Written Submission on RSP's Application to seek a DCO to re-open Manston Airport as a Strategic air cargo hub
Date: 15 May 2019 16:57:59
Attachments: [Written Submission to Planning Inspectorate 15-5-19.docx](#)
[Night flight, sleep disturbance record.docx](#)

Registration Identification No: 2001 4264

I am sending you my written submission opposing the application by RSP.

There is also a second attachment that gives a personal insight into the affect of night flights.

RP May

Written Submission to Planning Inspectorate: Re: ROSP's application to seek a DCO to re-open Manston Airport as a nationally significant air cargo hub

Registration Identification No: 2001 4264

Mr Raymond May

I am representing myself and my wife

Weakness of Business Case

First and foremost ROSP apparently lacks an understanding of the geographical fact that Manston's position, situated at the extreme eastern tip of Kent, with sea on three sides and where transport exiting from the site to London and beyond can only go in one direction, westwards. Its potential competitors in the cargo freight market, Stansted, Luton and East Midlands, are centrally located and are therefore better able to export and import freight, coming from and going to national destinations, over much smaller distances and at a cheaper cost.

Azimuth Associates under Dr Sally Dixon, claim there is a national need for a dedicated cargo airport in SE England and that the London airports have no spare capacity to meet a growing need of the air cargo market. These claims have been challenged by many other aviation experts. In essence, RSP has submitted a case that Manston is the only viable option to making up for the predicted shortfall in air freight business capacity over the next 20 years (a claim made by RSP). In its conclusion it says: "that the UK cannot afford to lose one of its long- serving and strategically significant airports." Well, the facts do not support these assertions. The airport has been closed for 5 years. The former owners, Infratil, a NZ company with assets of just under one and a half billion pounds (2016/17) and a capital investment of 70 million, have a long experience in transport (1). They own Wellington airport and used to own Lubeck airport in Germany, in addition to Glasgow airport. They could not make Lubeck, Glasgow or Manston airports, return a profit. They could have invested in Manston and tried to expand but obviously acted on wise counsels that it would not be feasible. (Both Glasgow and Manston were reportedly offloaded for £1!). RSP also ignores the facts that the dedicated airfreight business has been in decline for a long time. The majority of freight is carried in belly-hold passenger aircraft. Those airports that specialise in airfreight: Stansted, Luton and East Midlands, are well established, have the infrastructure in place and, above all, are in close proximity to where the cargo is going or coming from. Moreover, those airports can manage night flying as there are few people living under their flight paths: Stansted's nearest conurbation is Harlow, 16 Kms from its runway. East Midlands airport has no conurbations under its flight path and only Luton's extreme southern edge is under the flight path of its airport. In comparison, Manston has large populations under its flight path in nearby south Ramsgate and other smaller village populations nearby. RSP have conveniently ignored evidence from nationally commissioned studies on the future airport capacity in SE England. Apparently, "Manston airport is a regional and national asset." But few people seem to support RSP's view. Not the least, the air industry, who failed to put in a bid when the airport was auctioned; nor the government who didn't even mention this "national asset" in the Southeast Airport Enquiry. In regard to Azimuth Associates assertion, that the London airports have no spare capacity to meet a growing need of the air cargo market, they disregard the fact that Heathrow, the largest freight handler in the country, is to massively expand its capacity with a third runway in the near future. Stansted Airport's CAA data (See table A) on cargo tonnage and ATM's show fluctuations in cargo tonnage with no steady increase over 2016, 2017, 2018. The ATM's show an upward trend over the same period indicative of an increase in passenger traffic. The data demonstrates the fact that Stansted has spare capacity. Moreover, the head of business and cargo aviation at MAG (the operator for Stansted), Conor Busby, Speaking in October 2017, was confident that, "Stansted has potential to meet up to half of London's capacity shortfall over the next few years, and cargo will contribute towards this growth." (2). Stansted has an established trade in importing perishable produce from Africa, a trade that Manston had before and would rely on in the future, and so would be in direct competition with Stansted. RSP's claims and forecasts are highly unrealistic and inflationary. In its

submission RSP makes a false assumption in its master plan that freight tonnage/flights will rise inexorably over the next 20 years with not a blip in sight! If you examine the operational data from all the main London airports and, in particular, the dedicated airfreight businesses at Stansted, Luton and East Midlands, the tonnage figures vary on a regular basis and do not follow the Manston pattern suggested by RSP. (See table B). The most damning criticism of Azimuth Associates is reserved for its forecast of future freight tonnage at Manston. After just 2 years it states that there will be 97,000 tonnes, 43% of Stansted's 2016 tonnage and nearly a third of East Midlands tonnage. Then it says that after 10 years of operations it will handle 212,000 tonnes, 95% of Stansted's tonnage and 71% of East Midlands tonnage. Then by year 20 Manston has now one and a half times more tonnage than Stansted (341,000 tonnes to 223,000) and 114% higher than East Midlands (300,000). Where is this massive increase in air cargo coming from? Its main competitors have advantages galore- central locations, established infrastructure, long standing business connections here and abroad, investors to hand and fewer restrictions on night flying (3).

Next let us examine RSP's financial background. RSP's plans would require an investment of 300 million pounds to fulfil its aim of a nationally significant freight hub, and that they themselves would fund it. So here we have a company with no experience in the transport industry, (apart from one of the 6 directors, Tony Freudmann, whose c.v. mentions his involvement with the failed Planestation project, and capital infrastructure involvement at Lahr airport where no evening or night flights are allowed; and Cuneo airport that suffered a fall of 109,000 passengers in 2015. The inspectorate are well aware of moves by SRSP to withhold investor names and details. RSP have not been open and transparent in revealing their sources of income, balance sheets and financial company information. It comes as no surprise therefore that, Avia Solutions, one of the world's leading aviation advisors, with 15 years experience in the sector, and whose clients include a range of major airports and airlines, concluded that RSP's submission did not put forward a creditable case, nor provide evidence to change its views on the financial viability of Manston airport (3).

Consultation Flaws

The consultation by RSP has been selective, both in the locations covered and information conveyed in a confused manner in terms of environmental impacts, in particular night flights, fuel delivery system and effects on road traffic. The delivery has often been aggressive when they have been challenged from the floor. The impression one had was that they wanted to emphasise all the advantages of easy access to passenger flights to Europe for locals to win them over, but were rather coy about laying down the environmental impact of tens of thousands of ATM's on the people of Ramsgate, local villages and parts of Herne Bay. Where it was raised the trite response was that we have it all covered with our mitigation plans.

Environmental Impacts

The environmental impact of a 24/7 cargo hub as envisaged in this application is massive. The two main effects being noise and air pollution. Firstly I shall deal with noise pollution. The PEIRs in the RSP document section convey an impression that relatively few people would suffer from noise and air pollution resulting from a fully operational airport. My wife and I have lived in St Nicholas-at-Wade throughout the period when Manston was used for freight and passenger flights. The village is directly under the western flight path at 4.4 Km from the runway. My sleep was always disturbed during any night flights that occurred. The type of aircraft made no difference, as did the decibel count. You cannot make a scientific claim that certain "low quota" aircraft will not disturb peoples' sleep, nor can you draw lines on a map indicating certain noise levels, and then say people living outside that area will not be affected. (see night flight disturbance- personal evidence as an attachment). This relates to two years 2010/11 when there were 1,151 ATM's in 2010 and 1,472 ATM's in 2011 (4). After 5 years Azimuth Associates are forecasting over 9,900 ATM's, and after 10 years the forecast is over 212,000 ATM's (5). Mitigation by insulation or altering flight paths cannot eliminate sleep disturbance. Furthermore, we could clearly hear every reverse thrust of jet aircraft landing at the western end of the runway at 4.5 km away. This noise will be much louder in Minster, Cliffsend and south-western parts of Ramsgate, all closer than St.Nicholas. Summers are getting

hotter and windows and doors remain open for longer to provide relief. Day flights affecting the quality of life should also not be overlooked as it impacts upon the enjoyment of one's garden and other outdoor pursuits. Just under 900 people live in St. Nicholas and I suspect that their fears have not been given a proper airing at the open floor hearings. We moved to Minster in October 2016, living at the extreme southern edge of the village. (1.86 Km south-southwest of Manston's western runway). We, along with 3,780 (8 years since the last census) Minster residents, will be adversely affected by noise and air pollution caused by the proposed 28,000+ ATM's that RSP claim will be operating after 20 years. Minster's boundary is just 600 metres south-west of the western end of the runway. The whole of Minster is within 2 Km of the runway. Thanet District Council's Draft Local Plan 2031 (6) has 250 (750 people) houses earmarked for the Northern end of the village, the northern edge of which would be just 250 metres from the flight path. In addition, a further development of 130-140 houses (400 people), east of Tothill Street, is planned, starting just 600 metres from the flightpath (7).

Further to the effects of night flying, 59% of dedicated cargo ATM's at East Midlands airport are at night. There were 19,357 freighter ATM's. This makes 11,420 night ATM's, or 31 per night.(8) There are no large urban areas near the runway, unlike Manston where the south of Ramsgate, lying under the flight path, has tens of thousands of people (the area starts at 1.2 Km (Nethercourt) to 4.2 Km from runway at Ramsgate sands(7). The type of freight trade envisaged by Manston, long distance from Africa, would inevitably result in regular night flying and with 70% of flights to and from the eastern side of the airport would harm the residents of this area in terms of noise, air pollution, sleep deprivation and mental well-being. There are other populated areas that the examining authorities may not be aware of which are close or adjacent to the Manston site. (see table C). They include: St Nicholas-at-Wade, Minster, Cliffs End, Manston, Monkton. The first mentioned is directly under the western flight path as mentioned earlier. The other four villages are all within 1.5 km of the Manston site or flight path. This amounts to over 8,000 people affected to go with the approximately 20,000 people of south Ramsgate and several thousand who live in Hillborough and Beltinge (suburbs of Herne Bay) which are under or near the western flight path of Manston. Although some 11.25 km from the runway these areas are affected by aircraft landing from the west (6). There are other potential populated areas that would be impacted from 24/7 cargo hub airport. In the Draft Thanet Local Plan (2031) the Council have seen fit to choose option 2 in opposition to the government's preferred choice of using brownfield sites. As a result, the 2,500 houses earmarked for the Manston site will now be distributed around green sites around Thanet, much of which will be grade 1 agricultural land currently being farmed for crops. Westgate, in the north of Thanet, for example, will have to accept 1,000 houses. There are numerous sites planned for new housing estates that are close to the Manston site. The largest is SHLAA 013(1200 houses) which starts some 700 metres from the runway and are under or near the flight path). There are 16 other sites, totalling 1,658 houses to the south, south-east, east and north-east of the Manston site. Thanet District Council has submitted a local plan for 2,993 houses equating to nearly 9,000 people (3 per house) who would be subject to serious noise and air pollution. (see table D).

Tourism in Thanet, and particularly in Ramsgate, is on the upturn. Ramsgate has attracted visitors with an array of heritage assets. All this would be put at risk, both in terms of enjoyment of the facilities, but also of the very fabric of the historic buildings, by the deleterious effects of noise, vibration, pollution and visual disturbance. I shall not make any comments on the effect on biodiversity as this has been well covered by numerous organisations.

I should like to comment on the impact of increased traffic flows in and around the airport. There has not been enough importance given by RSP in relation to the impact of increased road transport on the A299, M2, A249, M20, M26, M25 (Dartford crossing area), caused by a large air freight airport. In time there will be big increases in HGV diesel vehicles driving to and from Manston serving its operational, fuelling and maintenance needs. After year 5 Azimuth's Associates' plans forecast over 19,000 diesel driven HGV's. They do not state a figure for diesel driven aviation fuel tankers necessary to supply the aircraft. After 10 years of operation the HGV figure rises to 27,400 movements, and after 15 years to nearly 42,000 movements per year, a frightening 5 per hour throughout the year(5). Over time this heavier traffic would have serious affects relating to increased

travel time, delays, air and noise pollution. Particulates from diesel exhausts are widely recognised as a very serious cause for concern for peoples' health.

Lastly, I should like to give some time to Climate Change that gets barely a mention in the raft of PEIR document on the RSP website. It states "that a full assessment of climate change impacts has yet to be completed, and will be included in the ES." Has the ES been published? Have the Planning Inspector Team seen this ES? May I be so bold as to suggest that the evidence of Manston's operation in respect of greenhouse gas emissions should be a vital element in weighing up its proposed benefits with the damage that a very large carbon footprint would cause. So I say to the Planning Team and their superiors, how would allowing a 24/7 cargo freight hub to be built and operate in terms of greenhouse gas emissions from burning aviation fuel burnt by long distance produce carrying transport and increased passenger flights to Europe (in preference to rail travel), sit with stricter government targets to reduce carbon emissions urgently, in the face of overwhelming evidence that the warming earth will result in a greater severity and frequency of storms, rainfall levels, droughts and sea level rises that would potentially turn Thanet into an island that it once was.

Alternative Use of the Manston Site

I fully support the current owners, Stone Hill Park, in their battle to defend their right as the landowner to develop the site as they see fit. Manston airport patrons have employed scare tactics to press their case for reopening by pressing for jobs rather than the 4,000 houses planned by SHP. What they do not announce loudly is that is that TDC's plan for 2,500 houses at Manston, on a brownfield site, will now go on greenfield sites around the urban boundaries and adjacent to where many of their supporters live! Stone Hill Park plans for housing, a manufacturing focused industrial Park, leisure areas including a large country park, sports complex and an Olympic-sized swimming pool, and part of the runway to be transformed into an events and recreational space(9). I believe their plan for Manston is more realistically achievable than RSP's plan, it can provide jobs and much needed housing without the threat of serious environmental harm.

Conclusion

The Minister for Transport and the Inspection Team have an important decision to make. They must look at the facts. The history of Manston airport as a successful aviation business is littered with master plans that were fanciful in their projections, cost the taxpayer big time and served only to prove the one obvious truth that Manston is in the wrong location to work as the air freight hub saviour propounded by RSP. The minister and the team should carefully examine the credentials of RSP itself: A company with little or no experience in developing and operating a supportable airport. Only one of its directors has had dealings in this field and some of those have resulted in failure. The Manston site already has a legitimate owner whose mixed development plans for the site are reasonable and measured. As part of that plan it should be made available for housing on a brownfield site, surely a sound preference. It would be seen as unjust by most if the department was seen to ride roughshod over the rights of the legal proprietor. Lastly, and most crucially, the minister and his team must take into consideration the overriding account of the 35,000 (this will increase substantially over the next decade) people who live, work and play under the flight path or near the airport itself. These are the people who will pay the price for the so called "national asset" operating at the economically viable level.

References:

- 1- Infratil website
- 2- Sorry but I have mislaid the web reference for this quote

Table A (source CAA)

Airport	Tonnage/ATM's	2016	2017	2018
Stansted:	Tonnage	224,312	203,746	226,128
	ATM's	164,473	172,201	184,485

Table B (source CAA)

Airport	Tonnage/ATM's	2015	2016	2017	2018
Stansted:	Tonnage	237,045	224,312	203,746	226,128
	ATM's	155,913	164,473	172,201	184,485
East Midlands	Tonnage	266,569	272,203	274,753	334,536
	ATM's	60,754	58,841	61,295	61,298
Luton	Tonnage	23,108	17,992	38,095	26,193
	ATM's	92,005	106,336	107,270	105,723

3- Report by Avia Solutions to TDC August 2017

4- Night flight disturbance- personal evidence as an attachment

5- Table 3.7 Azimuth Associates- Manston Airport air freight forecast

6- Distance references from Google Maps

7- Thanet Draft Local Plan 2031 ref: SHLAA 072

8 CAA data

9- SHP website

Table C- (2011 Census data)

Village	Population (2011 census)	*Distance from Runway/Flight path
St. Nicholas-at-Wade	853	4.5 km
Minster	3569	Less than 1.5 km
Cliffsend	1,822	Less than 100 m to l.t. 1.5 km
Manston	1,138	Less than 700m
Monkton	661	1.25 km

*at nearest point

Table D- Thanet Draft Local Plan 2031

SHLAA	Location	No of Dwellings	Potential Residents
013	Manston Court Rd/Haine Rd. Ramsgate	1,200	3,600
016	Cliffsend . S of Canterbury Rd	27	84
018	Haine/Spratling Rds. Ramsgate	85	
020	Opposite Eurokent Business Park/Haine Rd. Ramsgate	250	750
021	Manston Road, Ramsgate	64	132
048	Eurokent-new Haine Rd. Ramsgate	550	1,650
066	Manston Rd Industrial estate. Ramsgate	170	510
?	West of Tothill Str. Minster	250	750
072	East of Tothill Str. Minster	135	405
075	FoxboroughLane, Minster	35	105
076/078	St Nicholas at Wade	61	183
080/081/082	Cliffsend	70	210
087	Manston Rd Allotment Grds. Ramsgate	61	183
0534	Haine Farm, Ramsgate	35	105
Totals		2,993	8,979

During 2010 and 2011 Manston Airport was run by Infratil

The following recorded instances are of aircraft over-flying St Nicholas-at-Wade between 11pm and 7am:

<u>Date</u>	<u>Time</u>	<u>Aircraft</u>	<u>Operator</u>	
6-7-06	0250	MD 11	World Airways	
5-11-07	2348	B747	MK Airlines	
20-12-07	0135	B747	MK Airlines	
11-2-08	0134	B747	MK Airlines	
19-2-08	2310	?	?	No reply to complaint
sent 15-5-08				
10-3-08	0015	?	?	No reply to complaint
sent 15-5-08				
2-4-08	2312	?	?	No reply to complaint
sent 15-5-08				
14-5-08	0127	?	?	No reply to complaint
sent 15-5-08				
14-5-08	0352	?	?	No reply to complaint
sent 15-5-08				
23-12-09	2331	DC86	Air Charter	
29-1-10	0031	B744	Cargolux	
6-3-10	0013	B744	Cargolux	
28-3-10	0042	A30B	Egypt Air	
3-4-10	0414	A330	Military	
25-4-10	2319	A306	Egypt Air	
30-4-10	0035	B744	Cargolux	
5-5-10	0625	B744	Not given	
1-6-10	0917	DC86	Not given	(Flying at a dangerously
low height)				
27-6-10	0623	MD83	Not given	
27-6-10	2346	MD11	Not given	
6-9-10	0035	A300	Not given	
6-9-10	0208	MD11	Not given	
18-10-10	0052	A300	Not given	(ATC comment- Standard
departure procedure)				
17-2-11	0127	B744	Cargolux	(delayed) QC 2
17-2-11	0311	B744	Cargolux	QC4
16-6-11	0011	Not given	Egypt Air	(delayed) QC2
25-6-11	0253	Not given	Air Atlanta	(delayed) QC4
6-7-11	0030	B744	Cargolux	(suffered a delay)
6-7-11	0204	B744	Cargolux	(suffered a delay)
10-7-11	0516	B757	Iceland Air	(suffered a delay)
28-9-11	1057	MD11	World Airways	(Flying at a
dangerously low height) Also happened in August				
2-10-11	2355	B744	ACG Air Cargo	(delays at destination)
5-10-11	0304	B744	Atlas Air	

5-10-11	0434	B744	Cargolux
26-10-11	0305	B744	Cargolux
27-10-11	2332	MD11	World Airways
2-11-11	0006	B744	Cargolux
7-11-11	2336	30B	Tristar Air
1-12-11	0535	B744	ACT Airlines
9-12-11	0615	MD11	World Airways
12-12-11	0104	B744	Air Cargo Germany
27-1-12	0019	A30B	GCS Cargo

This does not represent a comprehensive list of night flights over St Nicholas-at-Wade as I have an annual holiday and spent occasional weekends away.
All of these aircraft would have been heard by many of the villagers in St Nicholas-at -Wade

Ray May

I do not have a record of night time disturbances from Feb 2012 to when the airport closed in May 2014.

"I lived in St Nicholas-at Wade throughout the period when Manston was used for freight and passenger flights. The village is directly under the western flight path at 4.4 Km from the runway. My sleep was always disturbed during any night flights that occurred. The type of aircraft made no difference, as did the decibel count. You cannot make a scientific claim that certain "low quota" aircraft will not disturb peoples' sleep, nor can you draw lines on a map indicating certain noise levels, and then say people living outside that area will not be affected. The enjoyment of my garden was affected by day flights, particularly in the warmer months. Air pollution was evident on my white window sills; and this was the effect of a freight tonnage of between 25,000 and 35,000 tonnes, massively below the RSP economic model."

(Extract from letter sent to PINS/RSP in response to DCO application to re-open Manston airport. 16-2-18))